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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
MEMORIAL HOSPITAL, INC. (doing  
business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”), et  
al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO  
EXTEND TIME FOR THIRD-  
PARTY PLAINTIFF RDC TO  
RESPOND TO THIRD-PARTY  
DEFENDANTS STEPHEN D.  
HOFFMAN AND LEWIS  
BRISBOIS BISGAARD & SMITH  
LLP’S MOTION TO STAY  
DISCOVERY REGARDING  
THIRD-PARTY COMPLAINT  
DURING PENDENCY OF  
MOTION TO DISMISS AND  
MOTION TO TRANSFER VENUE  
[ECF NO. 246]**

**(FIRST EXTENSION)**

AND RELATED COUNTERCLAIMS AND  
THIRD-PARTY CLAIMS.

1 IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-  
 2 1 and subject to this Court's approval, that Third-Party Plaintiff Razaghi Development  
 3 Company, LLC ("RDC") shall have an extension of time from March 8, 2023, up to and  
 4 **March 22, 2023**, to respond to Third-Party Defendants Stephen D. Hoffman and Lewis  
 5 Brisbois Bisgaard & Smith LLP's Motion to Stay Discovery Regarding Third-Party  
 6 Complaint During Pendency of Motion to Dismiss and Motion to Transfer Venue [ECF No.  
 7 246] ("Motion to Stay Discovery"). This is the first extension of the deadline referenced  
 8 herein.

9 The parties stipulate that there is good cause for the requested extension because  
 10 RDC will be responding to Third-Party Defendants' Motion to Dismiss RDC's Third-Party  
 11 Claim Against Lewis Brisbois and Stephen D. Hoffman [ECF No. 235] ("Motion to Dismiss  
 12 Third-Party Claim") on or before March 17, 2023 and RDC's response to the Motion to  
 13 Dismiss Third-Party Claim will then be available for the Court to consider in its  
 14 "preliminary peek" at the merits of the underlying Motion to Dismiss Third-Party Claim.  
 15 Further, the Motion to Stay also seeks a stay of discovery regarding the Third-Party  
 16 Complaint until resolution of RDC's Motion to Transfer Venue [ECF No. 245], to which  
 17 Third-Party Defendants El-Meligi and Dalgai still have until March 10, 2023 to respond.  
 18 Neither party will be prejudiced by the requested extension, and this request is made in good  
 19 faith and not for the purpose of delay.

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For the reasons set forth above, the parties ask the Court to approve this stipulation and allow Third-Party Plaintiff RDC up to and including five days after RDC files its response to the Motion to Dismiss Third-Party Claim at ECF No. 235, currently due on March 17, 2023, to respond to Third-Party Defendants' Motion to Stay Discovery at ECF No. 246.

RESPECTFULLY SUBMITTED this 7th day of March 2023.

/s/ Joel Z Schwartz (with permission)

Joel Z. Schwarz, Esq.

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Brisbois and Stephen D. Hoffman*

/s/ Kris Leonhardt

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*Lewis Brisbois Bisgaard & Smith LLP and*

*Stephen D. Hoffman*

An employee of Fisher & Phillips LLP

*/s/ Michelle C. Colwell*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

Dated: March 8, 2023

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